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April 23, 2014

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission  
3930 Fairview Industrial Drive SE  
Salem, Oregon 97302-1166

Attn: Filing Center

**RE: UM 1610 & UM 1369 –PacifiCorp’s Response to Renewable Energy Coalition’s  
Motion to Suspend Pacific Power’s Advice Filing 14-007**

Please find enclosed PacifiCorp d/b/a. Pacific Power’s Response to the above-referenced proceeding.


It is respectfully requested that all formal data requests to the Company regarding this filing be addressed to the following:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
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Please direct any informal inquiries to Gary Tawwater, Manager, Regulatory Affairs, at (503) 813-6805.

Sincerely,

  
R. Bryce Dalley  
Vice President, Regulation

Enclosures

cc:

Service List in UM 1610  
Service List in UM 1369

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1610, UM 1369**

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Investigation Into Qualifying Facility  
contracting and Pricing,

And,

In the Matter of

PUBLIC UTILITY COMMISSION OF  
OREGON

Investigation into Resource Sufficiency  
Pursuant to Order No. 06-538

Response of PacifiCorp to  
the Renewable Energy Coalition's  
Motion to Suspend Pacific Power's Advice  
Filing 14-007 and  
Commission Consideration of Such Filing  
Until May 30, 2014

1           On April 17, 2014 the Renewable Energy Coalition (REC) filed a motion requesting  
2 the Public Utility Commission of Oregon (the Commission) suspend the Advice Filing 14-  
3 007 of PacifiCorp, d/b/a Pacific Power (PacifiCorp or the Company) and the Commission's  
4 consideration of PacifiCorp's compliance filing in dockets UM 1610 and UM 1396 (the  
5 Compliance Filing) until May 30, 2014. As allowed by OAR 860-001-0420(5), the  
6 Company submits this response opposing REC's motion.

7           REC provides no compelling reason to link consideration of the Company's  
8 compliance filing to review of the compliance filings of Portland General Electric Company  
9 (PGE) or Idaho Power Company (Idaho Power). The utilities are differently situated with  
10 regard to each utility's integrated resource plan load and resource balance, sufficiency /  
11 deficiency period, and QF contracting requirements. Further, the Company trusts that the  
12 Commission can adequately review for consistency and avoid "divergent and inconsistent

1 implementation and prejudice”<sup>1</sup> through independent review of each utility’s compliance  
2 filing.

3           If the Commission grants REC’s motion to delay consideration of PacifiCorp’s April  
4 10, 2014 filing,<sup>2</sup> it is likely that the earliest possible date by which new avoided cost rates  
5 could go into effect is late June, nearly three months after the Company’s filing. Given  
6 REC’s contention that more than 30 days is necessary to review PacifiCorp’s filing, it seems  
7 likely that REC will similarly request suspension of the compliance filings of PGE and Idaho  
8 Power, with the result being additional delay in the implementation of PacifiCorp’s new  
9 avoided cost rates. PacifiCorp currently has an active qualifying facility power purchase  
10 agreement (PPA) queue of over 25 renewable projects that have made recent PPA requests  
11 and are seeking certainty regarding the currently--effective avoided cost price streams and  
12 contract terms for their proposed projects. Given the downward trend in avoided cost rates, it  
13 is not surprising that REC is attempting to delay the effective date of new avoided cost rates  
14 as long as possible.<sup>3</sup> However, preserving the current, higher avoided costs rates for as long  
15 as possible is not sufficient justification to delay consideration of the Company’s compliance  
16 filing and results in additional time during which customers are bearing the burden of higher  
17 avoided cost rates based on stale information.

18           PacifiCorp opposes the motion of REC to delay consideration of the Company’s

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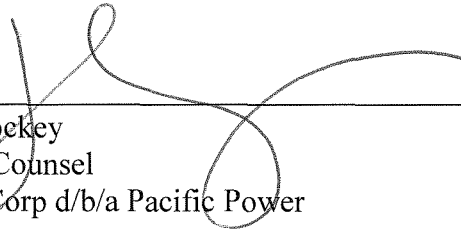
<sup>1</sup> Renewable Energy Coalition’s *Motion to Suspend Pacific Power’s Advice Filing 14-007 and Commission Consideration of Such Filing Until May 30, 2014* at 3 (April 17, 2014).

<sup>2</sup> ORS 758.525 states that “[a]t least once every two years each electric utility shall prepare, publish and file with the Public Utility Commission a schedule of avoided costs[.]” As noted in the application accompanying the Company’s filing, the April 10, 2014 filing dates represents the last possible date within the “once every two year” time frame required by ORS 758.525 and the date closest to the April 25, 2014 filing deadline established by Order No. 14-058. PacifiCorp acknowledged in its application that it has historically made its filing in compliance with ORS 758.525 in early March. However, PacifiCorp complied with the requirements of ORS 758.525 by filing April 10, 2014 and has not, as REC claims, late in filing.

<sup>3</sup> REC did not oppose PGE’s motion to delay its compliance filing until May 30, 2014. For purposes of consistent review by the Commission, it would have made just as much sense to support PGE making its compliance filing on April 25, 2014 rather than advocating for delayed consideration of PacifiCorp’s filing until May 30, 2014.

1 compliance filing until May 30, 2014. REC has not provided a compelling reason for such  
2 delay and such delay results in additional cost to customers. For these reasons, the Company  
3 respectfully requests the Commission deny REC's motion and move forward with  
4 consideration of PacifiCorp's compliance filing.

Respectfully submitted this 23<sup>th</sup> day of April, 2014.



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Etta Loekey  
Legal Counsel  
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## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Response on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

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Dated this 23<sup>rd</sup> Day of April 2014.

  
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I certify that I served a true and correct copy of PacifiCorp's Response on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

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